



**Coordinating Committee
San Francisco Bay Area
Integrated Regional Water Management Plan**
c/o San Francisco Public Utilities Commission
525 Golden Gate Avenue
San Francisco, CA 94102

May 14, 2014

Keith Wallace, Project Manager
California Department of Water Resources
Division of Integrated Regional Water Management
Financial Assistance Branch
Post Office Box 942836
Sacramento, CA 94236

Subject: Comments on Draft 2014 Drought Grant Proposal Solicitation Package

Dear Mr. Wallace:

The Coordinating Committee of the Bay Area Integrated Regional Water Management Plan appreciates the opportunity to comment on the Department of Water Resources Draft 2014 Drought Grant Proposal Solicitation Package (PSP).

The following are our suggestions for improving the PSP:

1. **Grant proposal simplicity.** While the draft PSP requirements are a little less onerous than previous PSPs for regular Proposition 84 solicitations, they still seem extremely complicated for a grant round intended to quickly move funds to expedite the implementation of projects that will result in almost immediate drought relief or drought preparedness. They do not significantly reduce the amount of work for project proponents, nor save money for regions. DWR should streamline the proposal process further so that it meets only the minimum requirements of Proposition 84 and SB 103. In addition to any "legal requirements," projects should only need to show that they meet a critical drought need, produce a significant amount of water, and do so at an acceptable cost based on the severity of local drought conditions.
2. **Grant proposal preparation period.** Although the draft Drought Solicitation streamlines the grant proposal process to some degree, preparation of a competitive proposal will still be quite time consuming and complex, and will require professional consultant assistance. The 30-day period in which to prepare the proposal after release of the final PSP is unreasonably short. A 60-day period is more reasonable, will provide regions with more time to identify and evaluate projects that are drought responsive, and should be seriously considered by DWR.

3. **Project scoring.** The draft PSP does not indicate with clarity how projects will be scored as to the relative needs across the state. While it has been suggested that IRWM regions need to make the case why theirs has a critical need and how their proposed projects meet the need, this approach will make it virtually impossible for DWR evaluators to determine need and score projects in any consistent fashion. The final PSP should provide specific criteria for region need and project scoring. Such criteria may help reduce the number of projects that clearly are not the most effective at meeting drought needs and thus make DWR's review of proposals much more efficient.
4. **CASGEM requirements.** The CASGEM monitoring eligibility requirement caught several of our constituents by surprise because it was not understood that groundwater basins within an agency's jurisdiction not considered viable for water supply purposes also had to be monitored. It was further not clear that unmonitored basins outside of our region's funding area could affect eligibility within. Our recommendation is that these agencies be eligible to apply for a grant in this Drought Solicitation as long as they indicate that they are pursuing the CASGEM requirements and will either have met them, or made sufficient progress towards meeting them, before grant funds are awarded for their proposed projects.
5. **Additional Material Submittal:** The timeframe for submitting additional information after the conditional award funding should be extended to at least 60 days. The 2014 IRWM Drought Grant Acknowledgement Form requires that the Regional Water Management Group (RWMG) agree to submit the detailed work plans, audited financial statements, etc., within 30 days of written notification of grant award. Included in the list of items to submit is "other materials that DWR deems necessary, which will be detailed in the award notification." It is understood that DWR must expedite this process and proceed to contracting as soon as possible. But RWMGs should be given at least 60 days to collect any "other materials." RWMGs are unable to begin collecting them now, like they could with a work plan or financial statement, since they do not know what the other materials are. In addition, 60 days would be more feasible for providing the other materials since the RWMGs need to work with multiple project proponents and project proponents will need to work with several different staff members within their organizations.

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Thank you again for the opportunity to comment and make suggestions to improve and expedite this drought solicitation process.

Sincerely,



 Steven R. Ritchie
Chairman, Bay Area IRWMP Coordinating Committee

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cc: Norma J. Camacho, Vice Chair